

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CHARLES M. MURRELL III,

Plaintiff,

v.

PATRIOT FRONT, THOMAS ROUSSEAU,  
AND JOHN DOES 1-99,

Defendants.

Civil No. 1:23-cv-11802

**DECLARATION OF ALLEN M. THIGPEN  
IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT**

In support of Plaintiff Charles M. Murrell III's ("Mr. Murrell") Request for Entry of Default Against Defendant Thomas Rousseau, I, Allen M. Thigpen, declare under penalty of perjury the following.

1. I am an attorney with the law firm Foley Hoag LLP and one of the attorneys representing Mr. Murrell in the above-captioned case. I submit this declaration in connection with Mr. Murrell's Request for Entry of Default against Thomas Rousseau.

2. On February 28, 2024, the summons and complaint were personally served on Thomas Rousseau at McLennan County Jail in Waco, Texas.

3. On March 1, 2024, Mr. Murrell, through counsel, filed the proof of service of Thomas Rousseau on the docket. Doc. No. 29.

4. Thomas Rousseau's answer or other responsive pleading was due on or before March 20, 2024. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

5. As of the date of this filing, according to my review of the docket and diligent observation of my electronic and physical correspondence, Thomas Rousseau has failed to plead

or otherwise defend the Complaint in accordance with Fed. R. Civ. P. 12.

I declare under penalty of perjury that the foregoing is true and correct. Executed this  
22nd day of April in Boston, Massachusetts.

/s/ Allen M. Thigpen  
Allen M. Thigpen (BBO No. 707799)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd of April, 2024, a true and accurate copy of the foregoing was electronically filed using the CM/ECF system.

/s/ Allen M. Thigpen

Allen M. Thigpen